

CLEARY GOTTLIEB STEEN & HAMILTON LLP

One Liberty Plaza
 New York, NY 10006-1470
 T: +1 212 225 2000
 F: +1 212 225 3999
 clearygottlieb.com

WASHINGTON, D.C. • PARIS • BRUSSELS • LONDON • MOSCOW
 FRANKFURT • COLOGNE • ROME • MILAN • HONG KONG
 BEIJING • BUENOS AIRES • SÃO PAULO • ABUDHABI • SEOUL

D: +1 212 225 2333
 memcdonald@cgsh.com

STEVEN M. LOEB
 CRAIG B. BROD
 NICOLAS GRABAR
 DAVID E. BRODSKY
 RICHARD J. COOPER
 JEFFREY S. LEWIS
 PAUL J. SHIM
 STEVEN L. WILNER
 ANDRES DE LA CRUZ
 DAVID C. LOPEZ
 MICHAEL A. GERSTENZANG
 LEV L. DASSIN
 JORGE U. JUANTORENA
 MICHAEL D. WEINBERGER
 DAVID LEINWAND
 DIANA L. WOLLMAN
 JEFFREY A. ROSENTHAL
 MICHAEL DAYAN
 CARMEN M. MUZZI, JR.
 JEFFREY D. KARP
 KIMBERLY BROWN BLACKLOW
 ROBERT J. RAYMOND
 FRANCISCO L. CESTERO
 FRANCESCA L. ODELL
 WILLIAM L. MCRAE
 JASON FACTOR
 JOON H. KIM
 MARGARET S. PEPPONIS
 LISA M. SCHWEITZER
 JUAN G. GIRALDEZ
 DUANE MCLAUGHLIN
 BRÉON S. PEACE
 CHANTAL E. KORDULA
 BENET J. O'REILLY
 ADAM E. FLEISHER
 SEAN A. O'NEAL
 GLENN P. MCGRORY
 MATTHEW P. SALERNO
 MICHAEL J. ALBANO
 VICTOR L. HOU
 ROGER A. COOPER
 AMY R. SHAPIRO
 JENNIFER KENNEDY PARK
 ELIZABETH LENAS
 LUKE A. BAREFOOT
 JONATHAN S. KOLODNER
 DANIEL ILAN
 MEYER R. FEDIDA
 ADRIAN R. LEIPSIC
 ELIZABETH VICENS
 ADAM J. BRENNEMAN
 ARD M. MANNION
 JAMES E. LANGSTON
 JARED GERBER
 COLIN D. LLOYD
 COREY M. GOODMAN
 RISHI ZUTSHI
 JANE VANLARE
 DAVID H. HERRINGTON
 KIMBERLY R. SPOERRI
 AARON J. MEYERS
 DANIEL C. REYNOLDS
 AUDRY X. CASUSOL
 ABENA A. MAINOO
 HUGH C. CONROY, JR.
 JOSEPH LANZKRON
 MAURICE R. GINDI
 KATHERINE R. REAVES
 RAHUL MUKHI
 ELANA S. BRONSON
 MANUEL SILVA
 KYLE A. HARRIS
 LINA BENSMAI
 ARON M. ZUCKERMAN
 KENNETH S. BLAZEJEWSKI
 MARKE E. MCDONALD
 F. JAMAL FULTON
 RESIDENT PARTNERS
 SANDRA M. ROCKS
 JUDITH KASSEL
 PENELOPE L. CHRISTOPHOROU
 BOAZ S. MORAD
 MARIE E. ALROCK
 HILDE A. SEIFRITZ
 KATHLEEN M. EMBERGER
 ANDREW WEAVER
 HELENA K. GRANNIS
 JOHN V. HARRISON
 CAROLINE F. HAYDAY
 NEIL R. MARKEL
 LAURA BAGARELLA
 JONATHAN D.W. GIFFORD
 SUSANNA E. PARKER
 DAVID W.S. YUDIN
 RESIDENT COUNSEL
 LOUISE M. PARENT
 OF COUNSEL

July 22, 2021

Application DENIED. No party seeks to maintain the letter at Dkt. No. 116 under seal.

VIA ECF

The Honorable Lorna G. Schofield
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

The Clerk of Court is respectfully directed to close the motion at Dkt No. 115 and unseal the motion at Dkt. No. 116.

Dated: July 30, 2021

Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC, et al.*, No. 20-cv-3773 (LGS):
 Request to File Under Seal


 LORNA G. SCHOFIELD
 UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

We respectfully write on behalf of Plaintiff Manbro Energy Corporation (“Plaintiff”), in accordance with Paragraph I.D.3 of Your Honor’s Individual Rules, to request leave to file under seal Plaintiff’s pre-motion letter seeking to strike improper rebuttal opinions submitted by Defendants’ valuation expert, Marc J. Brown (the “Letter”). Parties and attorneys of record who should have access to the sealed document are listed in Appendix A.

Plaintiff makes this sealing request pursuant to Paragraph 11 of the Stipulation and Order of Confidentiality, dated October 21, 2020 (ECF No. 51) (the “Confidentiality Order”). Plaintiff’s Letter references expert reports deemed Confidential Information or Discovery Material, as defined in the Confidentiality Order.

Pursuant to Paragraph I.D.3 of Your Honor’s Individual Rules, Plaintiff notes that it has no interest in confidential treatment of the information contained in the Letter and, therefore, absent objection by Defendants would propose to file the Letter on the public docket without any redactions. Should Defendants object to public filing and/or propose redactions, Plaintiff will of course be guided by the Court.

Respectfully Submitted,

/s/ Mark E. McDonald

Mark E. McDonald

cc: All Counsel of Record (via ECF)

Appendix A – Parties and Attorneys of Record

Parties

Manbro Energy Corporation

Chatterjee Advisors, LLC

Chatterjee Fund Management, LP

Chatterjee Management Company, d/b/a The Chatterjee Group

Purnendu Chatterjee

Cleary Gottlieb Stein & Hamilton, LLP

Joon H. Kim

Victor L. Hou

Rahul Mukhi

Mark E. McDonald

Gibson, Dunn & Crutcher LLP

Randy M. Mastro

Mark A. Kirsch

Avi Weitzman

Casey Kyung-Se Lee